

Application Serial No.: 10/045,511

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**REMARKS**

This is a full and timely response to the outstanding non-final Office Action mailed August 9, 2005. Claims 1-23 remain pending in the present application. Reconsideration and allowance of the application and pending claims are respectfully requested.

**1. Indication of Allowable Subject Matter**

Applicants greatly appreciate the Examiner's statement in the previous Office Action in which claim 9 has been indicated as allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. In that it is believed that every rejection has been overcome, it is respectfully submitted that each of the claims that remains in the case is presently in condition for allowance.

**2. Response To Rejections of Claims Under 35 U.S.C. § 112, Second Paragraph**

Claims 1, 2, 5, 7, 9-15, 18, and 19 have been rejected under 35 U.S.C. § 112 for purportedly having claim language with insufficient antecedent basis. Applicants respectfully traverse the rejection for the following reasons.

With regard to claims 1 and 10, the term "a printing device" in the preamble of claims 1 and 10 provides the antecedent basis for the term "the printing device" in the last limitation of claims 1 and 10.

With regard to claims 2, 5, 7, and 9, the term "the printing device" in base claim 1 provides the proper antecedent basis for the term "the printing device" in claims 2, 5, 6, and 9.

With regards to claims 11 and 18, the term "the printing device" in base claim 10 provides the proper antecedent basis for the term "the printing device" in claims 11 and 18.

With regards to claims 12 and 19, the term "another printing device" in the first limitation provides the antecedent basis for the term "the other printing device" in the last limitation of claims 12 and 19. Please note that it is proper grammar to use the phrase "another" instead of "an other."

With regards to claims 13-15, the term "the other printing device" in base claim 12 provides the antecedent basis for the term "the other printing device" in claims 13-15.

Accordingly, Applicants respectfully submit that the claims provide proper antecedent basis and respectfully request the rejections to be withdrawn.

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### 3. Response To Rejections of Claims Under 35 U.S.C. § 103

In the Office Action, claims 1-6, 10, 12-17, and 19-21 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over *Barry* (U.S. Patent No. 6,825,943) in view of *Utsunomiya* (U.S. Patent Application Publication No. 2004/0042042). Claim 7, 11, and 22 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over *Barry* in view of *Utsunomiya* in further view of *Sela* (U.S. Patent No. 5,913,018). Claims 8, 18, and 23 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over *Barry* in view of *Utsunomiya* in further view of *Jackelen* (U.S. Patent No. 6,823,147). It is well-established at law that, for a proper rejection of a claim under 35 U.S.C. §103 as being obvious based upon a combination of references, the cited combination of references must disclose, teach, or suggest, either implicitly or explicitly, all elements/features/steps of the claim at issue. *See, e.g., In Re Dow Chemical*, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988), and *In re Keller*, 208 U.S.P.Q.2d 871, 881 (C.C.P.A. 1981).

#### a. Claims 1-8

As provided in independent claim 1, Applicants claim:

A method implemented in a printing device, the method comprising:  
*receiving a request to print a document, the request and document being received by the printing device;*  
partitioning the document into one or more blocks;  
*communicating, to each of one or more additional printing devices, at least one of the one or more blocks;*  
receiving, from the one or more additional printing devices, a set of print-ready bits corresponding to the blocks communicated to the one or more additional printing devices; and  
*using, at the printing device, the received print-ready bits to print the document.*

(Emphasis added).

Applicants respectfully submit that independent claim 1 is allowable for at least the reason that *Barry* in view of *Utsunomiya* does not disclose, teach, or suggest at least "receiving a request to print a document, the request and document being received by the printing device," "communicating, to each of one or more additional printing devices, at least one of the one or more blocks," and "using, at the printing device, the received print-ready bits to print the document," as recited and emphasized above in claim 1.

Rather, both *Barry* and *Utsunomiya* teach that multiple printers are used to output a printed document. For example, *Barry* states that "the printed outputs of each of the print

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engines receiving select portions for printing are merged into the completed document." Col. 9, lines 5-10. *See also* Fig. 1b and Fig. 2b. Correspondingly, *Utsunomiya* also teaches the use of multiple printers to produce printed outputs. For example, in an illustrative example, *Utsunomiya* states that a "Printer 105 prints the printing data of the first page through the third page. Printer 106 prints the printing data of the fourth page through the sixth page," and so on. Therefore, *Barry* in view of *Utsunomiya* fails to teach or suggest at least "receiving a request to print a document, the request and document being received by the printing device," "communicating, to each of one or more additional printing devices, at least one of the one or more blocks," and "using, at the printing device, the received print-ready bits to print the document."

Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Barry* in view of *Utsunomiya* has not been made. Therefore, the rejections of claim 1 and claims 2-6 (which depend from claim 1) should be withdrawn.

Since *Sela* and *Jackelen* are legally inadequate to remedy the deficiencies of the *Barry* and *Utsunomiya* references with respect to claim 1, the rejections of claims 7 and 8 (which depend from claim 1) should also be withdrawn for at least this reason.

**b. Claims 10-11**

As provided in independent claim 10, Applicants claim:

One or more computer readable media having stored thereon a plurality of instructions that, when executed by one or more controllers of a printing device, causes the one or more controllers to perform acts comprising:  
*receiving a request to print a document, the request and document being received by the printing device;*  
partitioning the document into one or more portions;  
*communicating, to each of one or more additional printing devices, at least one of the one or more portions;*  
receiving, from the one or more additional printing devices, a set of print-ready bits corresponding to the portions communicated to the one or more additional printing devices; and  
*using, at the printing device, the received print-ready bits to print the document.*

(Emphasis added).

Applicants respectfully submit that independent claim 10 is allowable for at least the reason that *Barry* in view of *Utsunomiya* does not disclose, teach, or suggest at least "receiving a request to print a document, the request and document being received by the

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printing device," "communicating, to each of one or more additional printing devices, at least one of the one or more blocks," and "using, at the printing device, the received print-ready bits to print the document," as recited and emphasized above in claim 10.

Rather, both *Barry* and *Utsunomiya* teach that multiple printers are used to output a printed document. For example, *Barry* states that "the printed outputs of each of the print engines receiving select portions for printing are merged into the completed document." Col. 9, lines 5-10. *See also* Fig. 1b and Fig. 2b. Correspondingly, *Utsunomiya* also teaches the use of multiple printers to produce printed outputs. For example, in an illustrative example, *Utsunomiya* states that a "Printer 105 prints the printing data of the first page through the third page. Printer 106 prints the printing data of the fourth page through the sixth page," and so on. Therefore, *Barry* in view of *Utsunomiya* fails to teach or suggest at least "receiving a request to print a document, the request and document being received by the printing device," "communicating, to each of one or more additional printing devices, at least one of the one or more blocks," and "using, at the printing device, the received print-ready bits to print the document."

Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Barry* in view of *Utsunomiya* has not been made. Therefore, the rejection of claim 10 should be withdrawn. Further, since *Sela* is legally inadequate to remedy the deficiencies of the *Barry* and *Utsunomiya* references with respect to claim 10, the rejection of claim 11 (which depends from claim 10) should also be withdrawn for at least this reason.

c. Claims 12-18

As provided in independent claim 12, Applicants claim:

A method implemented in a printing device, the method comprising:  
*receiving, from another printing device, one or more portions of a document to be printed at the other printing device;*  
converting the one or more portions to a print-ready format; and  
*returning the one or more portions in the print-ready format to the other printing device for printing at the other printing device.*

(Emphasis added).

Applicants respectfully submit that independent claim 12 is allowable for at least the reason that *Barry* in view of *Utsunomiya* does not disclose, teach, or suggest at least "receiving, from another printing device, one or more portions of a document to be printed at the other printing device" and "returning the one or more portions in the print-ready format to

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the other printing device for printing at the other printing device," as recited and emphasized above in claim 12.

Rather, both *Barry* and *Utsunomiya* teach that multiple printers are used to output a printed document. For example, *Barry* states that "the printed outputs of each of the print engines receiving select portions for printing are merged into the completed document." Col. 9, lines 5-10. *See also* Fig. 1b and Fig. 2b. Correspondingly, *Utsunomiya* also teaches the use of multiple printers to produce printed outputs. For example, in an illustrative example, *Utsunomiya* states that a "Printer 105 prints the printing data of the first page through the third page. Printer 106 prints the printing data of the fourth page through the sixth page," and so on. Therefore, *Barry* in view of *Utsunomiya* fails to teach or suggest at least receiving one or more portions of a document from another printing device and then returning the one or more portions in a print-ready format to the other printing device for printing at the other printing device, as described in the claim.

Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Barry* in view of *Utsunomiya* has not been made. Therefore, the rejection of claim 12 and claims 13-17 (which depend from claim 12) should be withdrawn. Further, since *Jackelen* is legally inadequate to remedy the deficiencies of the *Barry* and *Utsunomiya* references with respect to claim 12, the rejection of claim 18 (which depends from claim 12) should also be withdrawn for at least this reason.

**d. Claims 19-20**

As provided in independent claim 19, Applicants claim:

One or more computer readable media having stored thereon a plurality of instructions that, when executed by one or more controllers of a printing device, causes the one or more controllers to perform acts comprising:  
*receiving, from another printing device, one or more blocks of a document to be printed at the other printing device;*  
converting the one or more blocks to a print-ready format; and  
*returning the one or more blocks in the print-ready format to the other printing device for printing at the other printing device.*

(Emphasis added).

Applicants respectfully submit that independent claim 19 is allowable for at least the reason that *Barry* in view of *Utsunomiya* does not disclose, teach, or suggest at least "receiving, from another printing device, one or more blocks of a document to be printed at the other printing device" and "returning the one or more blocks in the print-ready format to

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the other printing device for printing at the other printing device," as recited and emphasized above in claim 19.

Rather, both *Barry* and *Utsunomiya* teach that multiple printers are used to output a printed document. For example, *Barry* states that "the printed outputs of each of the print engines receiving select portions for printing are merged into the completed document." Col. 9, lines 5-10. *See also* Fig. 1b and Fig. 2b. Correspondingly, *Utsunomiya* also teaches the use of multiple printers to produce printed outputs. For example, in an illustrative example, *Utsunomiya* states a "Printer 105 prints the printing data of the first page through the third page. Printer 106 prints the printing data of the fourth page through the sixth page," and so on. Therefore, *Barry* in view of *Utsunomiya* fails to teach or suggest at least receiving one or more blocks of a document from another printing device and then returning the one or more blocks in a print-ready format to the other printing device for printing at the other printing device, as described in the claim.

Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Barry* in view of *Utsunomiya* has not been made. Therefore, the rejection of claim 19 and claim 20 (which depends from claim 19) should be withdrawn.

e. Claims 21-23

As provided in independent claim 21, Applicants claim:

A system comprising:

a principal printing device including a collective printing control module and a print engine;

a plurality of buddy printing devices, each coupled to the principal printing device via a network, and each including a buddy controller module;

*wherein the collective printing control module is configured to communicate, upon receipt of a request from a computing device to print a document, a different portion of the document to each of the plurality of buddy printing devices;*

*wherein the buddy controller module of each buddy printing device is configured to convert the portion of the document received from the principal printing device into a print-ready format and return the portion in the print-ready format to the principal printing device; and*

*wherein the collective printing control module is further configured to transfer the portions in print-ready format to the print engine for printing.*

(Emphasis added).

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Applicants respectfully submit that independent claim 21 is allowable for at least the reason that *Barry* in view of *Utsunomiya* does not disclose, teach, or suggest at least "wherein the collective printing control module is configured to communicate, upon receipt of a request from a computing device to print a document, a different portion of the document to each of the plurality of buddy printing devices; wherein the buddy controller module of each buddy printing device is configured to convert the portion of the document received from the principal printing device into a print-ready format and return the portion in the print-ready format to the principal printing device; and wherein the collective printing control module is further configured to transfer the portions in print-ready format to the print engine for printing," as recited and emphasized above in claim 21.

Rather, both *Barry* and *Utsunomiya* teach that multiple printers are used to output a printed document. For example, *Barry* states that "the printed outputs of each of the print engines receiving select portions for printing are merged into the completed document." Col. 9, lines 5-10. See also Fig. 1b and Fig. 2b. Correspondingly, *Utsunomiya* also teaches the use of multiple printers to produce printed outputs. For example, in an illustrative example, *Utsunomiya* states that a "Printer 105 prints the printing data of the first page through the third page. Printer 106 prints the printing data of the fourth page through the sixth page," and so on. Therefore, *Barry* in view of *Utsunomiya* fails to teach or suggest at least "wherein the collective printing control module is configured to communicate, upon receipt of a request from a computing device to print a document, a different portion of the document to each of the plurality of buddy printing devices; wherein the buddy controller module of each buddy printing device is configured to convert the portion of the document received from the principal printing device into a print-ready format and return the portion in the print-ready format to the principal printing device; and wherein the collective printing control module is further configured to transfer the portions in print-ready format to the print engine for printing."

Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Barry* in view of *Utsunomiya* has not been made. Therefore, the rejections of claim 21 should be withdrawn.

Since *Sela* and *Jackelen* are legally inadequate to remedy the deficiencies of the *Barry* and *Utsunomiya* references with respect to claim 21, the rejections of claims 22 and 23 (which depend from claim 21) should also be withdrawn for at least this reason.

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### **CONCLUSION**

For at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,

  
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